



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TBM/SMF  
F. #2021R00164

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 18, 2025

By ECF

The Honorable Rachel P. Kovner  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Shares of 21 East 61st Street Apartment Corp., et al.  
Civil Docket No. 24-2147 (RPK) (JAM)

Dear Judge Kovner:

The parties respectfully submit the below status update pursuant to the Court's July 21, 2025 Order directing that a joint status update be filed by August 18, 2025. For the reasons discussed below, the parties respectfully request leave to file a further joint status update by September 18, 2025.

The parties assume familiarity with the relevant factual and procedural history. As relevant here, on June 14, 2024, the government propounded special interrogatories on the Claimants, to which they issued initial and supplemental responses. On September 3, 2024, the government propounded a second set of special interrogatories on the Claimant Hak Seon Kim. On October 11, 2024, Kim responded, objecting to the each of the special interrogatories. Following meet and confers between the parties, on June 27, 2025, Kim provided a supplemental response to the second set of special interrogatories. Following a review of those interrogatories, the government intends to serve additional special interrogatories by this Wednesday, August 20, 2025. In accordance with Rule G(6)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, answers or objections will be due 21 days thereafter, or on or about September 10, 2025.

Separately, the parties have reached a tentative agreement on the propriety of the Claimants' confidentiality designations over certain of their special interrogatory responses. To that end, the parties no longer believe that judicial intervention is currently necessary to resolve outstanding discovery disputes, but have informed Judge Marutollo that they will promptly seek leave if such intervention becomes necessary.

In light of the foregoing, the parties respectfully request that they be given leave to submit a further joint status update by September 18, 2025.

Respectfully submitted,

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